



United States Department of Justice

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Northern District of New York*

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November 26, 2015

Randi Bianco, Esq.
Office of the Public Defender
The Clinton Exchange, 3rd Floor
4 Clinton Square
Syracuse, New York 13202

[BY EMAIL]

Re: United States v. Robert Snyder, [3:15-CR-269]

Dear Counselor:

This letter memorializes and confirms copies of discovery materials which are hereby being sent to you via email attachments. In an email sent to you today, I provided you with 4 Excel documents/attachments containing all search terms recovered from defendant's digital devices. Please be advised that all the information, reports, and materials identified and discussed in these Excel discovery documents/attachments will be offered into evidence at the trial.

Pursuant to the Criminal Pre-Trial Order issued in this case and Rules 16 and 12 of the Federal Rules of Criminal Procedure, the government hereby requests reciprocal discovery from defendant. Also, pursuant to Rule 12.1 of the Federal Rules of Criminal Procedure, the government requests any and all alibi notice as required by the federal rules. Finally, pursuant to the rules, we request notice of any expert witness that the defense intends to call at trial whether it pertains to the guilt phase or the sentencing phase.

Sincerely,

RICHARD S. HARTUNIAN
United States Attorney

Miroslav Lovric
Assistant U.S. Attorney

cc: United States District Court, ECF

CERTIFICATE OF SERVICE FOR ELECTRONIC CASE FILING SYSTEM

I hereby certify that on November 26, 2015, I electronically filed with the NDNY Clerk of the District Court using the CM/ECF system the above-referenced document(s) in connection with the above-referenced case. The CM/ECF system automatically sent electronic notifications of such filing to the attorneys of record in this case, as maintained by the District Court Clerk's Office, AND who are properly registered in the CM/ECF system for the NDNY as required pursuant to NDNY General Order #22. As for any attorney of record in this case who is not registered in the CM/ECF system for the NDNY, the government has caused to be mailed or faxed to that attorney either the actual CM/ECF electronic notification/e-mail as received from the CM/ECF system by the government and/or the actual documents being filed. Therefore, the non-registered attorney(s) will receive the same electronic ECF notice with the same information as will the attorney(s) who is/are registered in the CM/ECF system.

Miroslav Loric

Assistant U.S. Attorney